

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re: Earle Stanley Greer		: Bankruptcy No. 18-18146-elf
Debtor		: Chapter 13
		:
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STONEHEDGE FUNDING, LLC, Movant		: vs.
		: <b>Hearing on <u>04/30/2019</u> at <u>9:30 am</u></b>
		: <b>in Courtroom <u>1 (Nix)</u></b>
EARLE STANLEY GREER, Debtor		:
and		:
WILLIAM C. MILLER, Trustee		: 11 U.S.C. § 362

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**CERTIFICATION OF NO RESPONSE TO MOTION FOR  
RELIEF FROM STAY FILED BY  
STONEHEDGE FUNDING, LLC  
AND REQUEST FOR ENTRY OF COURT ORDER**

The undersigned, Robert S. Esposito, Esquire, attorney for Stonehedge Funding, LLC, ("Stonehedge") hereby certifies as follows:

1. Stonehedge filed a Motion for Relief from Automatic Stay to Allow Enforcement of its Mortgage on Premises 2216 S. 69<sup>th</sup> Street, Philadelphia, Pennsylvania 19442 in the present bankruptcy proceedings on April 5, 2019.
2. On the same date, true and correct copies of this Motion, together with all supporting exhibits and documents, and together with Stonehedge's Notice of Motion, Response Deadline and Hearing Date, were served on all parties in interest.
3. No answer or other responsive pleading has been received by the undersigned to date, whereupon the Debtor is now in default of the requirements imposed by the above Notice.

WHEREFORE, the undersigned respectfully requests the Court to enter an Order modifying the stay in the form attached to Stonehedge's Motion for Relief.

Date: 04/27/2019

  
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ROBERT S. ESPOSITO, ESQUIRE  
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Blue Bell, Pennsylvania 19422-3367  
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Attorney for Stonehedge Funding, LLC

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FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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	Debtor	:	Chapter 13
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STONEHEDGE FUNDING, LLC, Movant		:	
	vs.	:	<b>Hearing on <u>04/30/2019</u> at <u>9:30 am</u></b>
		:	<b>in Courtroom <u>1 (Nix)</u></b>
EARLE STANLEY GREER,	Debtor	:	
and		:	
WILLIAM C. MILLER	Trustee	:	11 U.S.C. § 362

**CERTIFICATION OF SERVICE OF  
REQUEST FOR COURT ORDER**

I, ROBERT S. ESPOSITO, ESQUIRE, attorney for Stonehedge Funding, LLC, certify that true and correct copies of Stonehedge's Certification of No Response to Motion for Relief from Stay and Request for Entry of Order were served on those listed and in the manner listed below on April 27, 2019:

Earle Stanley Greer  
3 Carriage Lane  
Lansdowne, PA 19050  
Debtor, Pro.Se.  
Via U. S. First Class Mail

William C. Miller, Esquire  
P. O. Box 1229  
Philadelphia, PA 19105  
Chapter 13 Trustee  
Via Court CM/ECF Electronic System

United States Trustee  
833 Chestnut Street, Suite 500  
Philadelphia, PA 19107  
Via Court CM/ECF Electronic System



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Email: RSE@AttorneyEsposito.com  
Attorney for Stonehedge Funding, LLC